### IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

TALIA N. HARRISON, :

Plaintiff,

: Civil Action No.: 4:21-cv-00607

CIVILIE

Tyler Technologies, Inc., :

VS.

:

Defendant.

# UNOPPOSED MOTION FOR EXTENSION OF TIME FOR PLAINTIFF TO FILE A RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND FOR DEFENDANT'S RESPONSE THERETO

Pursuant to this Court's Order of July 15, 2022 (ECF No. 24), the deadline for Plaintiff to submit a Response to the Defendant's Motion for Summary Judgment is August 26, 2022.

However, the parties agreed to Plaintiff filing a response three weeks after Defendant's complete document production. Plaintiff received Defendant's complete production on August 15, 2022. Plaintiff respectfully requests that the deadline for submitting a response to Defendant's Motion for Summary Judgement be rescheduled to September 5, 2022. Defendant is not opposed to this extension, so long as the Court will also extend Defendant's deadline to file its Reply to

September 19, 2022. This extension is sought in good faith, before the deadlines have passed, and is not filed for purposes of delay.

Dated: August 26, 2022

Respectfully submitted,

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s/ Melinda Arbuckle
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Counsel for Plaintiff

# **CERTIFICATE OF CONFERENCE**

Counsel for Plaintiff conferred with counsel for Defendant regarding the relief requested in this Motion on August 26, 2022 via email, and Defendant is unopposed to this Motion.

<u>s/Melinda Arbuckle</u> Melinda Arbuckle

# **CERTIFICATE OF SERVICE**

On August 26, 2022, I filed the foregoing document with the Clerk of Court for the Eastern District of Texas using CM/ECF method of the Court. I certify that I have served all counsel of record electronically thereby.

<u>s/Melinda Arbuckle</u> Melinda Arbuckle